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June 8, 2022

The Honorable Denise L. Cote
United States District Judge
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312
-Via ECF-

Granted.
Denise Cote
6/8/22

Re: USA v. Emiliano Bomba,
19 Cr. 463 (DLC)

Dear Judge Cote,

Our office represents Mr. Emiliano Bomba, in the above captioned matter.

On October 2, 2020, Mr. Bomba was released on a \$1.5 Million bond secured by: six (6) Financially Responsible Persons; a \$650,000.00 cash deposited with the Court; and by real estate property with an estimated equity value of \$970,000.00, at that time.

The real estate property that partially secures the bond is being sold.

We respectfully request that the Court allows for a substitution of the real estate property that partially secures the bond to a real estate property located at, 2019 Ocean Parkway, Brooklyn, NY, with an estimated equity value of \$1.25 Million.

We further request that the prior real estate property be exonerated from this bond in the Southern District of New York, so that the owner of that property may be able to sell it free and clear.

The government, by way of A.U.S.A. Aline Flodr, consents to this request for a substitution of property.

Thank you very much for your consideration.

S/Telesforo Del Valle Jr.
Telesforo Del Valle Jr., Esq.
Attorney for Defendant,
Emiliano Bomba

Cc.
A.U.S.A. Aline Flodr , Esq.
A.U.S.A. Sebastian Swett, Esq.
A.U.S.A. Stephanie Lake, Esq.